## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

	:	
In Re:	:	Chapter 11

Tri-State Paper, Inc. : Bankruptcy Number: 23-13237

Debtor :

## NOTICE OF ENTRY OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that Citizens Bank, N.A., successor by merger to Citizens Bank of Pennsylvania, a creditor in interest in the above case, by and through its undersigned counsel, hereby enters its appearance pursuant to Section 1109(b) of the Bankruptcy Code and Bankruptcy Rule 9010(b), and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007, and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in this case be given and served upon the undersigned at the following address/telephone number/ facsimile number/email address:

Kristen Wetzel Ladd, Esquire Unruh, Turner, Burke & Frees P.O. Box 515 West Chester, PA 19381-0515 (610) 692-1371 kladd@utbf.com

PLEASE TAKE FURTHER NOTICE THAT, pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, email, delivery, telephone, telegraph, telex, or otherwise filed or made with regard to the referenced cases and proceedings therein.

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PLEASE TAKE FURTHER NOTICE THAT neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive Citizens Bank, N.A., successor by merger to Citizens Bank of Pennsylvania's (i) right to have final orders in non-core matters entered only after a de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which Citizens Bank, N.A., successor by merger to Citizens Bank of Pennsylvania is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

By:

Respectfully submitted,

UNRUH, TURNER, BURKE & FREES, P.C.

Date: October 31, 2023

Kristen Wetzel Ladd, Esquire

Attorney for Citizens Bank, N.A., successor by merger to Citizens Bank of Pennsylvania

P.O. Box 515

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